

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:	:	Chapter 13
Kevin Michael Keough	:	
Debtor	:	
	:	
Ally Financial INC	:	CASE No. 1:18-bk-03251-HWV
c/o Carrington Mortgage Services, LLC	:	
Movant	:	
v.	:	
	:	
Kevin Michael Keough	:	
Debtor/Respondent	:	
and	:	
	:	
Charles J DeHart, III, Esquire	:	
Trustee/Respondent	:	

ANSWER

AND NOW, this 10th day of February, 2021, the Debtor, Kevin Michael Keough, by and through counsel, Dawn M. Cutaia, of Pugh & Cutaia, PLLC, files this Answer to the Motion for Relief from Stay filed by Ally Financial INC.:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted in part; Counsel for Debtor will obtain this information from Debtor.
8. Admitted

9. Admitted

10. Denied.

WHEREFORE, Debtor respectfully requests this Honorable Court deny the Motion for Relief and allow the Debtor to either pay the balance of the arrears by rolling the arrears into an amended plan.

Respectfully Submitted,

By: **/s/ Dawn M. Cutaia**
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